

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. LIN WOOD, JR.,

Plaintiff,

v.

**BRAD RAFFENSPERGER, in his official
capacity as Secretary of State of the State
of Georgia, REBECCA N. SULLIVAN,
in her official capacity as Vice Chair of
the Georgia State Election Board,
DAVID J. WORLEY, in his official
capacity as a Member of the Georgia
State Election Board, MATTHEW
MASHBURN, in his official capacity as
a Member of the Georgia State Election
Board, and ANH LE, in her official
capacity as a Member of the Georgia
State Election Board,**

Defendants.

**CIVIL ACTION FILE NO.
1:20-cv-04651-SDG**

**CORRECTED AFFIDAVIT OF RUSSELL JAMES RAMSLAND, JR.
IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER**

I, Russell James Ramsland, Jr., declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.

2. I am part of the management team of Allied Security Operations Group, LLC, (ASOG). ASOG is a group of globally engaged professionals who come from various disciplines to include Department of Defense, Secret Service, Department of Homeland Security, and the Central Intelligence Agency. It provides a range of security services, but has a particular emphasis on cybersecurity, open source investigation and penetration testing of networks. We employ a wide variety of cyber and cyber forensic analysts. We have patents pending in a variety of applications from novel network security applications to SCADA (Supervisory Control and Data Acquisition) protection and safe browsing solutions for the dark and deep web. For this report, I have relied on these experts and resources.
3. In November 2018, ASOG analyzed audit logs for the central tabulation server of the ES&S Election Management System (EMS) for the Dallas, Texas, General Election of 2018. Our team was surprised at the enormous number of error messages that should not have been there. They numbered in the thousands, and the operator ignored and overrode all of them. This led to various legal challenges in that election, and we provided evidence and analysis in some of them.
4. As a result, ASOG initiated an 18-month study into the major EMS providers in the United States, among which is Dominion that provides

EMS services in Michigan. We did thorough background research of the literature and discovered there is quite a history from both Democrat and Republican stakeholders in the vulnerability of Dominion. The State of Texas rejected Dominion's certification for use there due to vulnerabilities. Next, we began doing passive penetration testing into the vulnerabilities described in the literature and confirmed for ourselves that in many cases, vulnerabilities already identified were still left open to exploit. We also noticed a striking similarity between the approach to software and EMS systems of ES&S and Dominion. This was logical since they share a common ancestry in the Diebold voting system.

5. Over the past three decades, almost all the states have shifted from a relatively low-technology format to a high-technology format that relies heavily on a handful of private services companies. These private companies supply the hardware and software, often handle voter registrations, hold the voter records, partially manage the elections, program counting the votes and report the outcomes. Michigan, Minnesota, Georgia and other states use these systems.
6. These systems contain a large number of vulnerabilities to hacking and tampering, both at the front end where Americans cast their votes, and at the back end where the votes are stored, tabulated, and reported.

These vulnerabilities are well known, and experts in the field have written extensively about them.

7. Dominion ("Dominion") is a privately held company that provides election technologies and services to government jurisdictions. All counties in the state of Georgia as well as numerous counties in Minnesota, Michigan, Pennsylvania, Nevada and Arizona use the Dominion Election Management System. The Dominion system has both options to be an electronic, paperless voting system with no permanent record of the voter's choices, paper ballot-based system or hybrid of those two.
8. The Dominion Election Management System's central accumulator does not include a protected real-time audit log that maintains the date and time stamps of all significant election events. Key components of the system utilize unprotected logs. Essentially this allows the internal operator or an external attacker the opportunity to arbitrarily add, modify, or remove log entries, causing the machine to log election events. The system makes the creation and maintenance of various logs voluntary, so that the user has a choice to "not retain" or "conceal" their actions. Further, when logs are left unprotected and can be altered, they no longer serve the functional purpose of provided a transparent audit log to the public or election officials.

9. My colleagues and I at ASOG have studied the information that is publicly available concerning the November 3, 2020, election results. Based on the significant anomalies and red flags that we have observed, we believe to a reasonable degree of professional certainty that election results have been manipulated within the Dominion system in Georgia. As one example, Dr. Andrew Appel, Princeton Professor of Computer Science and Election Security Expert has observed, with reference to Dominion Voting machines, "I figured out how to make a slightly different computer program that just before the polls were closed it switches some votes around from one candidate to another. I wrote that computer program into a memory chip and now to hack a voting machine you just need 7 minutes alone with it and a screwdriver." We list below other red flags that our team has uncovered. Until a thorough forensic analysis of the voting system hardware and software is conducted, it will be impossible to know for certain.
10. One red flag has been seen in Antrim County, Michigan. In Michigan we have seen reports of 6,000 votes in Antrim County that were switched from Donald Trump to Joe Biden and were only discoverable through a hand counted manual recount. While the first reports have suggested that it was due to a "glitch" after an update, it was recanted and later attributed to

“clerical error.” This change is important because if it were not due to clerical error, but due to a “glitch” emanating from an update, the system would be required to be “re-certified” according to Dominion officials. This was not done. We are skeptical of these assurances as we know firsthand this has many other plausible explanations and a full investigation of this event needs to be conducted as there are a reported 47 other counties using essentially the same system in Michigan and all counties in Georgia. It is our belief (based on the information we have acquired to this point) that the problem most likely did occur due to a glitch where an update file didn’t properly synchronize the ballot barcode generation and reading portions of the system. If that is indeed the case, there is no reason to assume this would be an isolated error. This “glitch” would either cause the vote to be misread and directed to another candidate on the ballot or cause the entire ballot upload batch to read as zero in the tabulation processor. This in turn hands over to the system operator at the voting site full control of vote allocation for the entire batch of ballots. We also observed provisional ballots were accepted properly but in-person ballots were being rejected (zeroed out and/or changed - flipped). Further, there have been multiple reports in Georgia of ballot scanners needing to have ballots re-oriented in order to read them, and in noticeable differences in the amount of time required to read them. This is

very troubling because this should not occur in a single purpose/single application voting exercise, and reading time differences such as these can be indicators of remote code being randomly executed. Because of the highly vulnerable nature of these systems to error and exploits, it is likely that some, or all of the counties in Georgia and 47 counties in Michigan with these systems may have experienced the same problem.

11. Another statistical red flag is evident in the number of votes cast compared to the number of voters in some precincts. A preliminary analysis using data obtained from the Minnesota Secretary of State pinpoints a statistical anomaly so far outside of every statistical norm as to be virtually impossible. There are a stunning 3,276 precincts in Minnesota where the Presidential Votes Cast compared to the Estimated Voters based on Reported Statistics ranges from 84% to 350%. Normalizing the Turnout Percentage of this grouping to 80%, (still way above the national average for turnout percentage) reveals 31,954 excess ballots allegedly processed. There were at least 19 precincts where the Presidential Votes Cast compared to the Estimated Voters based on Reported Statistics exceeded 100%.

Precinct Township	Votes/SOS Est. Voters
BENVILLE TWP	350%
MONTICELLO P-1	144%
MONTICELLO P-2	138%
ALBERTVILLE P-2	138%
ALBERTVILLE P-1	136%
BRADFORD TWP.	104%
VELDTTWP.	104%
CHAMPION TWP	104%
KENT CITY	103%
WANGERTWP.	102%
KANDIYOHI TWP.	102%
LAKE LILLIAN TWP.	102%
HOKAH TWP.	102%
HOUSTON TWP.	101%
HILL RIVER TWP.	101%
SUNNYSIDE TWP.	101%
BROWNSVILLE TWP.	101%
OSLO	101%
EYOTA TWP.	101%

12. The same phenomenon can be observed in Michigan where even the very limited remaining public data reveals 643 precincts with voter turn-out above 80%, according to county records. Further if these very limited

remaining public data votes were normalized to 80% turnout (still 15%+/- above normal), the excess votes are at least 36,812 over the maximum that could be expected. We anticipate that precincts with excess voter turnout will be even higher with complete public data (Some larger precincts in Wayne Co and others are no longer publicly reporting their data).

Precinct/Township	% Turnout
City of North Muskegon	781.91%
Zeeland Charter Township	460.51%
Grout Township	215.21%
City of Muskegon	205.07%
City of Detroit	139.29%
Spring Lake Township	120.00%
Greenwood Township	100.00%
Hart Township	100.00%
Leavitt Township	100.00%
Newfield Township	100.00%
Otto Township	100.00%
Pentwater Township	100.00%
Shelby Township	100.00%
Shelby Township	100.00%
Weare Township	100.00%
City of Hart	100.00%
Grand Island Township	96.77%
Tallmadge Charter Township	95.24%
Fenton	93.33%
Bohemia Twp	90.63%
Zeeland Charter Township	90.59%

13. The following data strongly suggests that the additive algorithm (a

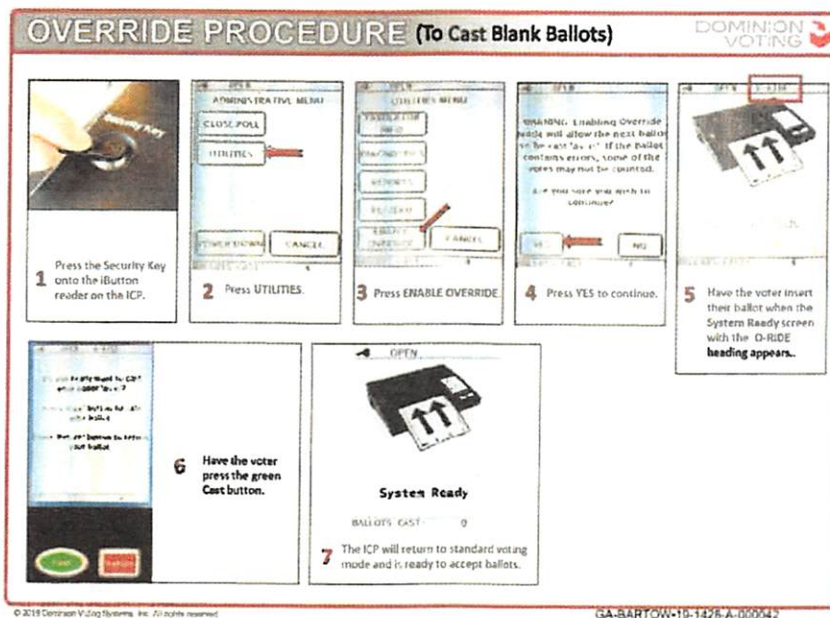
feature enhancement referred to as "ranked choice voting algorithm" or "RCV") was activated in the code as shown in the Democracy Suite EMS Results Tally and Reporting User Guide, Chapter 11, Settings 11.2.2. It reads in part, "RCV METHOD: This will select the specific method of tabulating RCV votes to elect a winner." For instance, blank ballots can be entered into the system and treated as "write-ins." Numerous reports of write-in votes mysteriously appearing on poll closing tapes have been reported by poll workers, such as that of Keith Kaminski of Detroit, MI, attached. The operator can then enter an allocation of the write-ins among candidates as he or she wishes. The result then awards the winner based on "points" that the algorithm computes, not actual voter votes. The fact that we observed raw vote data in the Edison Research feed and coming directly from the Dominion data feed that includes decimal places proves that the winner was selected by an algorithm, and not individual voter's choice. Otherwise, votes would be solely represented as whole numbers (votes cannot possibly be added up and have decimal places reported). Below is an excerpt from Dominion's direct feed to news outlets showing actual calculated votes with decimals.

state	timestamp	eevp	trump	biden	TV	BV
michigan	2020-11-04T06:54:48Z	64	0.534	0.448	1925865.66	1615707.52
michigan	2020-11-04T06:56:47Z	64	0.534	0.448	1930247.664	1619383.808
michigan	2020-11-04T06:58:47Z	64	0.534	0.448	1931413.386	1620361.792
michigan	2020-11-04T07:00:37Z	64	0.533	0.45	1941758.975	1639383.75
michigan	2020-11-04T07:01:46Z	64	0.533	0.45	1945297.562	1642371.3
michigan	2020-11-04T07:03:17Z	65	0.533	0.45	1948885.185	1645400.25

14. Yet another statistical red flag in Michigan concerns the dramatic shift in votes between the two major party candidates as the tabulation of the turnout increased and *a significant irregularity surfaces*. Until the tabulated voter turnout reached approximately 83%, Trump was generally winning between 55% and 60% of every turnout point. Then, after the counting was closed at 2:00 am, the situation dramatically reversed itself, starting with a series of impossible spikes shortly after counting was supposed to have stopped. The several spikes cast almost solely for Biden could easily be produced in the Dominion EMS control system by pre-loading batches of blank ballots in files such as Write-Ins, then casting them almost all for Biden using the Override Procedure (to cast Write-In, Blank, or Error ballots) that is available to the operator of the system. A few batches of blank ballots could easily produce a reversal this extreme; a reversal that is almost as statistically difficult to

explain as is the impossibility of the votes cast to the number of voters described in Paragraphs 11 and 12 above. See Melissa Carone, Affidavit, attached.

Dominion also has a “Blank Ballot Override” function that is essentially a “save for later” bucket that can be manually populated by the operator later.



15. Another red flag comes from mail-in ballots dates. The voter records of the counties show that 96,600 mail-in ballots were voted, yet the county records show they were never received back. Further, 42 mail-in ballots were received back completed *before* they were mailed out to the voter by the county, 1,887 mail-in ballots were received back completed *the same day* they were mailed out to the voter by the county, 1,786 mail-in ballots were received back completed *one day after* they were mailed out to the voter by the county and 2,275 mail-in ballots were received back completed only *two day after* they were mailed out to

the voter by the county. This impossible phenomenon occurred throughout the counties of Georgia and were not an isolated event. This is summarized below.

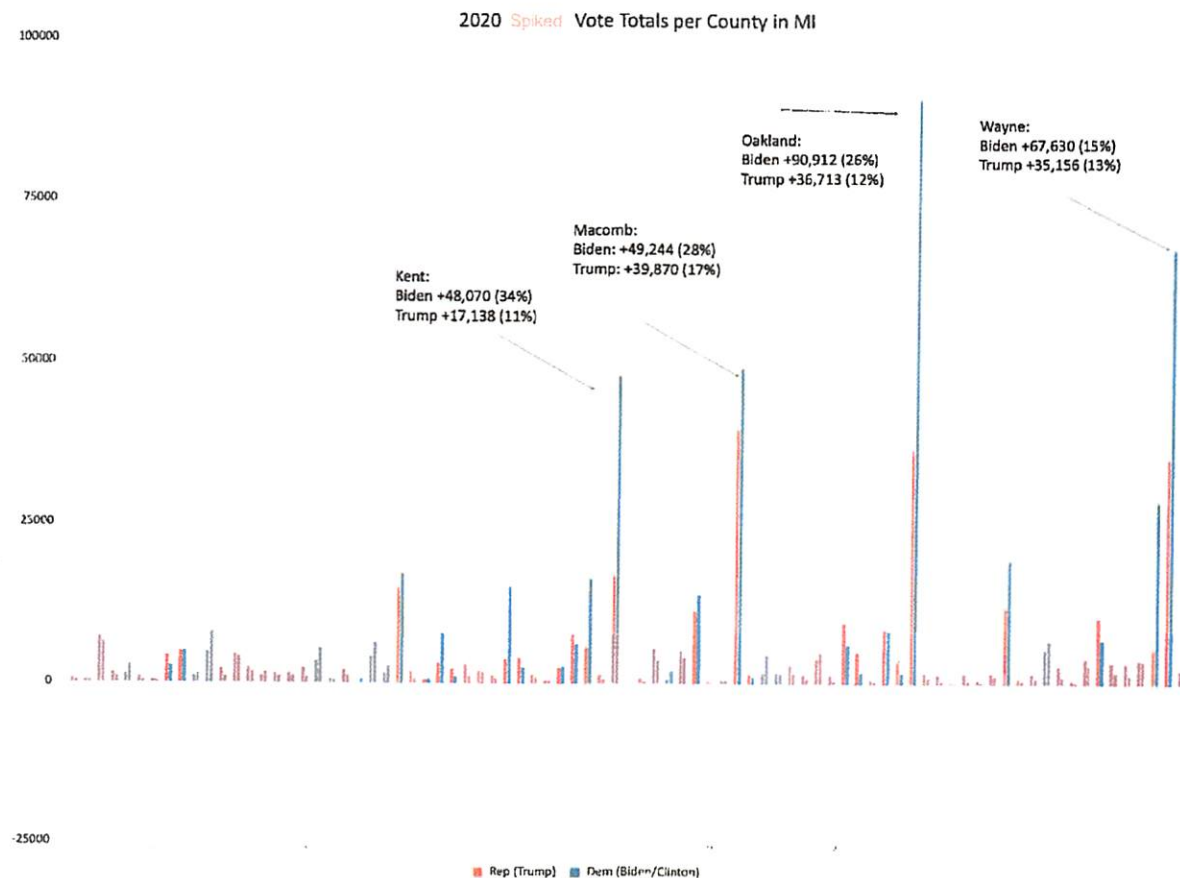
GEORGIA MAIL-IN BALLOT ISSUES

Ballots received back completed BEFORE they were mailed out	42
Ballots received back completed THE SAME DAY they were mailed out	1,887
Ballots received back completed ONE day after they were mailed out	1,786
Ballots received back completed TWO days after they were mailed out	2,275
Total Ballots with impossible mail out and received back completed dates	<u>5,990</u>
Ballots with NO RETURN RECORD AT ALL	231,188
Ballots with NO RETURN RECORD & Cancelled	134,588
Ballots with NO RETURN RECORD & Voted	<u>96,600</u>
	<u>231,188</u>

16. The final red flag is perhaps the greatest. Something occurred in Michigan that is physically impossible, indicating the results were manipulated on election night within the EMS. The event as reflected in the data are the 4 spikes totaling 384,733 ballots allegedly processed in a combined interval of only 2 hour and 38 minutes. This is physically impossible given the equipment available at the 4 referenced locations (precincts/townships). We looked at ballots processed and cross referenced the serial numbers and types of the scanning devices used at each location to determine the amount of ballot processing capacity per the equipment performance specifications. The Model DRM16011 processes 60 images/min. without accounting for paper jams, replacement cover sheets or loading time, so we calculate 2,000 ballots/hr/machine in field conditions, which is probably generous. This calculation yields a sum of 94,867 ballots as the

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maximum number of ballots that could be processed. It should be noted that in the event of a jam and the counter is not reset, the ballots can be run through again effectively duplicating them – This was noted in Ms. Carone’s affidavit, a Dominion Contract Employee working in Detroit (attached). The existence of the spike is indicative of a manual adjustment either by the operator of the system (see paragraph 14 above) or an attack by outside actors. **In any event, there were 289,866 more ballots processed in the time available for processing in four precincts/townships, than there was processing capacity.** The graph below demonstrates this.



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17. Furthermore, in Becker County, Minnesota, 46 out of 47 precincts/townships display a highly unlikely 96%+ as the number of votes cast, using the Secretary of State's number of voters in the precinct/township; and 25 of those 47 precincts/townships show 100% turnout

Precinct Townshi12	Votes/SOS Est. Voters
SPRUCE GROVE TWP	100%
ATLANTA TWP	100%
RUNEBERG TWP	100%
WOLF LAKE TWP	100%
HEIGHT OF LAND TWP	100%
EAGLE VIEWTWP	100%
WOLF LAKE	100%
SHELL LAKE TWP	100%
SAVANNAH TWP	100%
CUBATWP	100%
FORESTTWP	100%
RICEVILLE TWP	100%
WALWORTH TWP	100%
OGEMA	100%
BURLINGTON TWP	100%
RICHWOOD TWP	100%
AUDUBON	100%
LAKE EUNICE TWP	100%
OSAGETWP	100%
DETROIT LAKES W2 P1	100%
CORMORANT TWP	100%
LAKE VIEW TWP	100%
AUDUBON TWP	100%
DETROIT LAKES W3 P1	100%
FRAZEE	100%

18. Based on the foregoing, we believe that these statistical anomalies and impossibilities compels the conclusion to a reasonable degree of professional certainty that based on the evidence in Georgia, Minnesota and Michigan, where the Dominion system is widely, (and in the case of Georgia exclusively) used, the vote count in Georgia, in particular for candidates for President contain at least 102,590 illegal votes that must be disregarded.
19. If *ASOG*, or any other team of experts with the equivalent qualifications and experience, could be permitted to analyze the equipment and resultant raw data produced during the course of the election, as well as the audit logs that the Dominion system generates and the equipment that generated it, we would likely be able to determine whether or not any fraudulent manipulation of the election results occurred within the Dominion Election Management System. These
20. However, there are several deficiencies with the Dominion audit logs: (1) because the logs are "voluntary" logs, they do not enforce the logging of all actions; (2) the logs can be altered by the people who are operating the system; and (3) the logs are not synchronized. Because of these deficiencies, it is of critical importance that all equipment (PollBooks, Imagecast, Tabulators, Scanners, Routers, etc.) as well as all

of the daily full records of raw data produced during every step of the election process also be made available for analysis (in addition to the audit logs), so that gaps in the audit logs may be bridged to the best extent possible. This raw data, which is in Dominion's possession, should be individual and cumulative.

21. In order to analyze the data and determine the cause of these anomalies, ASOG would need access to all equipment, administrator logs for the EMS Election Event Designer (EED) and EMS Results Tally & Reporting (RTR) Client Applications. The following would be required from Dominion:

XML and XSLT logs for the:

- Tabulators
- Result Pair Resolution
- Result Files
- Provisional Votes
- RTM Logs
- Ranked Profiles and entire change history Audit Trail logs
- Rejected Ballots Report by Reason Code

**Identity of everyone accessing the domain name
Admin.enr.dominionvoting.com and**

- Windows software log,

- Windows event log and
- Windows security log of the server itself that is hosted at Admin.enr.dominionvoting.com.
- Access logs to their full extent and DNS logs.
- Internal admin.enr.dominionvoting.com logs
- Ranked Contests and entire change history Audit Trail log

FTP Transfer Points Log

22. In order to evaluate the raw data of the election, the following records would be required from Dominion.

- Daily and Cumulative Voter Records for those who voted with sufficient definition to determine:
Voters name and Registered Voting address
Address to for correspondence
D.O.B.
Voter ID number
How Voted (mail-in, in-person early, in person Election Day)
Where Voted (if applicable)
Date voted (if applicable)
Party affiliation (if recorded)
Ballot by mail Request Date

Ballot by mail Sent date

Ballot by mail Voted date (if applicable)

Ballot cancelled date (if applicable)

- .RAW, HTML, XHTML and SVG files (Ballot Images)

23. Any removable media (such as thumbdrives, USB, memory cards, PCMLA cards, etc.) used to transfer ballots to central counting from voting locations, as well as paper ballots.

24. Access or control of ALL routers, tabulators, or combinations thereof (some routers are inside the tabulator case) in order to garner the system logs. At the same time, the public IP of the router should be obtained.

25. Any key, authorization key & yubikey.

[SIGNATURE AND OATH ON NEXT PAGE]

I declare under penalty of perjury that the foregoing statements are true and correct.


Russell James Ramsland, Jr.

STATE OF TEXAS

COUNTY OF Dallas

Russell James Ramsland, Jr., appeared before me, a Notary Public in and for the above jurisdiction, this 25th day of November 2020, and after being duly sworn, made this Declaration, under oath.





Notary Public

My Commission Expires 08-20-2022